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HONORABLE MARY JO HESTON
HEARING DATE: February 20, 2020
TIME: 1:00 pm
RESPONSE DATE: February 13, 2020
Chapter 13

4 **IN THE UNITED STATES BANKRUPTCY COURT FOR THE**
5 **WESTERN DISTRICT COURT OF WASHINGTON**

6 **Re**

7 **CARRIE ANN RIVERS**

8 **Debtor(s)**
9

In Chapter 13 Proceeding
No. 19-43575-MJH

RESPONSE TO TRUSTEE'S
OBJECTION TO EXEMPTIONS

10 COMES NOW the above-referenced debtor(s) through their attorneys of record and responds to
11 the Trustee's Objection to Exemptions as follows:

12
13 Debtor agrees to determine the amount of exemptions to be determined at the time of
14 liquidation.

15 Debtor disagrees that she should be denied any exemption under Wash. Rev. Code Sections
16 7.68.070(10) and 51.32.040. Debtor was assaulted and if the State chooses at some point to
17 file criminal charges due to the assault and the defendant in the criminal case is awarded to pay
18 criminal restitution to the Debtor as part of the criminal proceeding then those funds ARE
19 exempt. Schedules A/B, & C have been amended to clarify and separate out the criminal from
20 the civil matter.

21
22 Dated January 29, 2020.

23
24 /s/ Ellen Ann Brown

25 **ELLEN ANN BROWN WSB#27992**

Attorneys for Debtor(s)

RESPONSE

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